

5. As such, counsel for the Defendant is requesting that this matter be stayed for an additional six months to allow review of the discovery, to conduct an investigation, and to prepare any necessary pleadings.

6. Counsel for the government, Seth Aframe, Esq., assents to the relief requested herein.

WHEREFORE, the Defendant requests that this Honorable Court:

- A. Stay this matter for an additional six months;
- B. Allow the Defendant to supplement the record as described; and
- C. Grant such other and further relief as the justice requires.

Respectfully submitted,

Lisa Biron

By and through her counsel,

/s/Charles J. Keefe

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Certificate of Service

I, Charles J. Keefe, hereby certify that on June 8, 2016, true copies of the above document were served upon AUSA Seth Aframe of the United States Attorney's Office for the District of New Hampshire by ECF.

/s/Charles J. Keefe

Charles J. Keefe